

Department of Public Health  
and Human Services

Section:  
CASE MANAGEMENT

TANF CASH ASSISTANCE

Subject:  
Program Compliance Reviews (a.k.a.  
Quality Control Reviews)

**Supersedes:** TANF 1508-2 (2/1/02)

**References:** 45 CFR 205.40; ARM 37.78.102; 37.78.227

GENERAL RULE--Program Compliance (PC) Reviews are conducted on a statistical sampling of cases. The reviews provide:

1. a systematic method for measuring the accuracy of eligibility determinations;
2. a basis for determining error rates;
3. information to base corrective action plans at all levels of administration; and
4. a basis for establishing the State Agency's eligibility for FS enhanced funding or liability for excessive error rates.

**SHARED GOALS:** The Public Assistance Bureau and the Program Compliance Unit share the common goal of improving the payment accuracy of cases by:

1. making every reasonable effort to demonstrate that each case selected for review is eligible and receiving the correct benefits; and
2. maintaining the integrity of Program Compliance rules and regulations.

**► FAILURE/  
REFUSAL TO  
COOPERATE**

When an individual refuses or fails to cooperate with the PC review, the PC Supervisor will send a letter to the appropriate county informing the county of the client's refusal/failure to cooperate.



If the individual is receiving TANF cash assistance, the OPA Eligibility Case Manager must send timely notice of adverse action and close the TANF cash assistance for non-compliance with the PC review, which is a non-financial eligibility requirement (TANF 300).

**NOTE:** For TANF cash assistance, the non-compliance can be based on a PC review for any program, including MA and/or FS.

**► ELIGIBILITY**

Eligibility for TANF cash assistance may be re-established if the individual:

**REESTABLISHED**

1. Reapplies for TANF and provides all information necessary to determine eligibility for TANF cash assistance, **if the non-compliance was with a Medicaid review**; or
2. Reapplies for TANF and is in compliance with the **FS review or the time frame for compliance with the FS review has expired**.

**NOTE:** The time frame for compliance is included on the non-compliance letter sent to the OPA. If you are still unsure of the time frame, please contact PC.

**EXAMPLES OF NON- COMPLIANCE**

Program Compliance considers the household to be in non-compliance if the client refuses to provide the reviewer with any information needed to complete the review. When a household is in non-compliance with a review, a certified letter is sent to the household and a copy is sent to OPA.

**PROCEDURE****Responsibility:****ACTION**

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|------------|--|
| County OPA | 1. Sends the case to the Program Compliance Auditor (PCA) within three (3) calendar days after being notified (phone, e-mail or letter) by the PCA that the case has been selected for review.   |
| PC Auditor | <ol style="list-style-type: none"> <li>2. Returns the case file to the County OPA within three (3) calendar days of receipt.</li> <li>3. Reviews information gathered from all sources (e.g., case file, TEAMS, collateral contacts, etc.) and determines whether eligibility was determined correctly.</li> <li>4. Contacts County OPA, if needed to:               <ol style="list-style-type: none"> <li>a. notify the county if the case was dropped due to inability to locate;</li> <li>b. communicate information discovered relevant to any assistance program that could affect eligibility.</li> </ol> </li> </ol> |
- NOTE:** Contact will be made immediately if the information could cause a continuing error.
- c. provide feedback to allow for correction of errors if one error offsets another error resulting in no dollar error; and

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- d. work cooperatively with all parties involved in the review process.

**NOTE:** The Regional Policy Specialist may be consulted by either the County OPA staff (following County protocol) or the PCA.

5. Submits the findings and the PC review file to the PC Supervisor within 45 calendar days after the case was assigned for review.

PC Supervisor

6. Reviews the PCA findings and determines if eligibility was determined correctly.

**NOTE:** The guideline for PC supervisor review is within 15 calendar days of receipt of the PC review. However, **case files should be forwarded to the next step in this process as soon as possible.** Some steps may take longer than indicated.

- a. **When no error is found**, the findings are finalized and a QC-5(a) with a *smiley face* is sent to:

- (i) the county OPA; and/or,
- (ii) the Regional Policy Specialist.

- b. **When an error is found**, the error is explained on a QC-5(a) and copies are sent via E-Mail to:

- (i) the OPA County Director;

**NOTE:** Verifications obtained by PC relative to any identified error are faxed to the County Director.

- (ii) the appropriate Regional Policy Specialist; and
- (iii) The Central Office Policy Specialist.

**NOTE:** The hard copy PC file is sent to the Central Office Policy Specialist.

County OPA

7. Completes the QC-5(a) form within 10 calendar days either concurring or not concurring with the error findings.

**NOTE:** Consults with Regional Policy Specialist as needed prior to completing the QC-5(a).

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| Central Office Policy Specialist | <p>8. Consults with County OPA staff (and Regional Policy Specialist, if necessary) prior to finalizing the error with the PC Supervisor if the County OPA's rebuttal is not upheld.</p> <p>9. Reaches consensus on the status of the error within 10 calendar days.</p> <p><b>NOTE:</b> If consensus cannot be reached, the decision is made by the Program Compliance and the Public Assistance Bureau Chiefs.</p> <p>10. Promptly contacts the County Director or designee and explains the reasoning used if the decision goes against the county's rebuttal. (Contact is generally done by telephone.)</p> |
| PC Supervisor                    | <p>11. Completes form QC-5(b), which indicates the final error determination and sends it to:</p> <ul style="list-style-type: none"> <li>a. the Central Office Policy Specialist;</li> <li>b. the County OPA; and</li> <li>c. the Regional Policy Specialist.</li> </ul>  |
| County OPA                       | <p>12. Updates open cases within 15 calendar days and based on information obtained throughout this process, takes all necessary action, including:</p> <ul style="list-style-type: none"> <li>a. case closure; and/or,</li> <li>b. initiation of an Intentional Program Violation (IPV), if appropriate.</li> </ul> <p><b>NOTE:</b> Underissuances and collections of over-issuances are administered as soon as possible but no later than the quarter in which the error was discovered.</p>   |
| County Director                  | <p>13. Assures all errors are corrected timely.</p>   |
| Central Office Policy Specialist | <p>14. Tracks error factors in a monthly report for training and planning purposes.</p> <p>15. Meets and consults with Regional Policy Specialists and Central Office Policy Specialists as needed to share error data and improve payment accuracy.</p>  |
| Regional QA Specialist           | <p>16. Completes a TEAMS review of the error cases 90 calendar days after the QC-5(b) was issued to assure accuracy has been maintained.</p>  |

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**NOTE:** Any unresolved issues related to the PC review are  
taken to the Field Manager for resolution.

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